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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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AUG 19 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the) CC Docket No. 92-237
North American Numbering Plan)
Carrier Identification Codes (CICs))

**COMMENTS OF AMERITECH
OPPOSING EMERGENCY PETITION FOR STAY**

Ameritech¹ files its Comments opposing MCI's Petition for Emergency Stay filed on August 12, 1998, requesting a delay in the phase-in of the mandatory use of 4-digit carrier identification codes ("CICs"). The Commission reaffirmed on May 1, 1998, that the use of 3-digit CICs must be phased-out, but in response to concerns expressed by MCI and others, extended the deadline for the elimination of the permissive use of 3-digit CICs from July 1, 1998, to September 1, 1998.² Thereafter, the Commission required that for not less than six months calls using 3-digit CICs and, thus, dialed using 5-digit carrier access codes ("CACs"), be blocked and routed to an educational intercept message instructing the caller on how to use the 4-digit CICs by dialing a 7-digit CAC.³ In its Order, the Commission specifically rejected MCI's request that the Commission further extend the "permissive dialing period".⁴

¹ Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

² See, Administration of the North American Numbering Plan Carrier Identification Codes, Declaratory Ruling, released May 1, 1998, para. 3.

³ Ameritech's intercept message advises the caller that "Your call cannot be completed as dialed. If you dialed a 5-digit code, it has changed. Please re-dial adding a one and a zero before the 5 digit code, or for assistance contact the carrier you are trying to use."

⁴ Id.

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Despite the fact that the Commission has already recently ordered a extension of the deadline for mandatory use of 4-digit CICs, MCI has renewed its request for a further extension of the permissive dialing period, this time claiming it has discovered “technical problems”. MCI asserts that:

[I]t has discovered that when dialing a 5-digit Carrier Access Code (“CAC”) from an end office already converted to 4-digit CICs (i.e., no longer accepts 3-digit dialing), many end users do not immediately receive the appropriate “intercept” announcements, but instead are routed by LECs to delayed announcement after a prolonged period of ringing (averaging between 15-100 seconds or 3 to 20 rings) without call completion. (MCI Petition at p.1)

MCI also asserts that a majority of local exchange carrier (“LEC”) offices have yet to be converted to mandatory 4-digit CIC/7-digit CAC dialing.

When Ameritech first received MCI’s Petition, Ameritech was very surprised and concerned, since it has procedures in place that require its technicians to test whether new translations in its local switches (like those required to route traffic using a 3-digit CIC/5-digit CAC to the intercept message) are performing properly. Further, Ameritech’s technicians are also required to test whether the intercept message is properly answering calls within a reasonable period of time. As a result, when Ameritech received the MCI Petition it verified whether or not those tests had been performed. Ameritech determined that in fact these tests had been successfully performed, and that the delays alleged by MCI are simply not occurring on Ameritech's network. To the contrary, technicians involved in placing the test calls report that the calls were answered on average of 1 to 3 rings, most of the time on the first ring.

However, Ameritech further validated whether its network is functioning properly and that implementation of mandatory use of 4-digit CIC does not “threaten the integrity of all ‘dial-around’ interexchange services,”⁵ by conducting an additional informal test. One office

⁵ Public Notice p. 1.

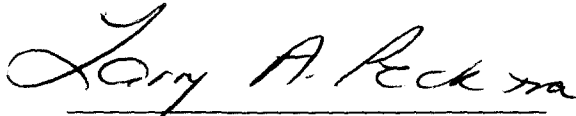
representing each of the major switch vendors (e.g., NORTEL, Seimens, Lucent) where mandatory 4-digit CIC/7-digit CAC dialing has been implemented, was randomly selected in each of the five states that Ameritech serves as an incumbent LEC. Test calls were generated from each of these selected switches by dialing two 5-digit CACs: 10321 and 10288. Results of these tests calls confirm that these 5-digit CAC dialed calls are still being answered by the educational intercept message on average of within 1 to 3 rings, in most instances on the first ring.⁶ Thus, implementation of mandatory use of 4-digit CICs on September 1, 1998, in the Ameritech network will not threaten the integrity of dial-around interexchange services.

In addition, MCI's argument that LECs are "hugely deficient in their conversion to 4-digit CICs" is not true, at least as applied to Ameritech. The fact of the matter is that Ameritech is in the midst of successfully converting its offices to mandatory 4-digit CIC dialing, and fully expects to meet the Commission's deadline. In fact, the Commission recently asked LECs (Exhibit A) to advise it of the status of the conversion to mandatory 7-digit CAC dialing. In response to the Commission's request, Ameritech advised the Commission (Exhibit B) that 23% of Ameritech's offices had already been converted as of August 12, 1998. As of August 18, 1998, Ameritech has increased its percent of completed offices to 43%. Even though some work remains, Ameritech fully expects to complete implementation of mandatory 7-digit CAC dialing by September 1, 1998.

⁶ Ameritech is experiencing a minor problem with the routing of 100 series 3-digit CICs from a limited number of switches. In these cases, the calls are being properly blocked, but are being routed to a different intercept message. However, only a very small percent of dial around calls are affected.

In summary, contrary to MCI's allegations, Ameritech's conversion to mandatory 4-digit CICs is progressing successfully and will be completed on schedule. Moreover, Ameritech is not experiencing significant problems with the blocking of calls using 3-digit CICs, or with the timeliness of its intercept messages. As a result, MCI's Petition should be rejected.

Respectfully submitted,

A handwritten signature in cursive script, reading "Larry A. Peck".

Larry A. Peck
Counsel for Ameritech
Room 4H86
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025
(847) 248-6074

Dated: August 19, 1998
[LAP0194.doc]



Federal Communications Commission
Washington, D.C. 20554

Approved by OMB
3060-0843
Expires 02/28/99
Est. Avg. Burden Per
Response: 8 Hours

August 6, 1998

Ms. Celia Nogales
Ameritech
1401 H Street, N.W.
Suite 1020
Washington, D.C. 20005

Re: Status of Phase-Out of Three-Digit CICs

Dear Ms. Nogales:

As you know, in the Commission's CICs Order on Reconsideration adopted on October 20, 1997, the Commission extended the transition from three to four-digit carrier identification codes (CICs) from January 1, 1998 until June 30, 1998. Subsequently, in a Declaratory Ruling adopted on May 1, 1998, the Common Carrier Bureau (Bureau) clarified that under the CICs Order on Reconsideration carriers may not begin blocking three-digit CIC earlier than July 1, 1998. The Bureau granted a waiver, however, of the July 1, 1998 deadline for the complete blocking of all three-digit CICs, to allow a two-month phase-out of three-digit CICs. All blocking of three-digit CICs must be completed no later than September 1, 1998.

It has been brought to the Bureau's attention that some LECs have not yet initiated the phase-out of three-digit CICs. For this reason, the Bureau requests that Ameritech report to the Bureau on its progress in phasing out three-digit CICs. Identical requests are being made of Ameritech Operating Companies, Bell Atlantic, BellSouth, GTE Service Corporation, Southwestern Bell Corporation, and US West, Inc.. In addition to a general statement on Ameritech's progress in phasing out three-digit CICs, the Bureau requests that Ameritech address the following specific issues:

- (1) the percentage of blocking completed by Ameritech to date and the percentage of blocking expected to be completed by August 15, 1998;
- (2) any problem areas or barriers that have arisen in the course of Ameritech's work on the blocking of three-digit CICs (e.g., an agreement to a temporary delay in the blocking of three-digit CICs in response to a request from Americatel Corporation);
- (3) whether Ameritech anticipates any work stoppage issues during the month of August 1998 that would affect Ameritech's ability to complete blocking by September 1; and,

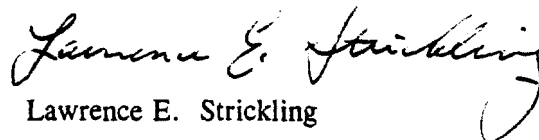
Ms. Celia Nogales

Page Two

- (4) if work stoppage issues are anticipated, what contingency plans Ameritech has put in place to deal with those issues and to achieve compliance with the requirement to complete the phase-out of three-digit CICs by September 1, 1998.

Please submit the requested information, in letter form no later than **August 15, 1998**, to: Geraldine A. Matisse, Chief, Network Services Division, Common Carrier Bureau, Federal Communications Commission, 2000 M Street, N.W., Room 235, Washington, D.C. 20554. Questions should be directed to Kris A. Monteith (202/418-1098) or Renee Alexander (202/418-2497).

Sincerely,


Lawrence E. Strickling

Notice to Individuals: The five regional Bell operating companies and GTE are required to submit reports to the Common Carrier Bureau (Bureau) describing their progress in phasing out three-digit Carrier Identification Codes (CICs). This data is critical to the general and specific implementation and oversight responsibilities that the Commission bears under the Communications Act to evaluate the status and development of competition in the provision of local exchange telecommunications services. Statutory authority for information collection from carriers and other entities is set out in the following sections of the Communications Act: Section 4(i), 47 U.S.C. § 154(i); Section 215, 47 U.S.C. § 215; and Section 218, 47 U.S.C. § 218. Your response is mandatory.

This data request will be used to evaluate the status of developing competition in the long distance telecommunications markets. The information will be used by the Commission to determine whether the phase-out of three-digit CICs is being implemented.

An agency may not conduct or sponsor and a person is not required to respond to a collection of information unless it displays a currently valid control number. The control number assigned to this collection is 3060-0843.

We have estimated that each response to this collection of information will take, on average, 8 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERF, Washington, D.C. 20554, Paperwork Reduction Project (3060-0843). We also will accept your comments via the Internet if you send them to jboley@fcc.gov. Please **DO NOT SEND COMPLETED RESPONSES TO THIS ADDRESS.**

Data Requests Sent To:

Ameritech
Bell Atlantic
BellSouth Corporation
GTE Service Corporation
SBC
US WEST, Inc.

Copy To:

MCI



Celia Nogales
Director - Federal Relations

August 14, 1998

Ms. Geraldine A. Matisse
Chief, Network Services Division
Common Carrier Bureau
Federal Communications Commission
2000 M Street, NW
Room 235
Washington, DC 20554

Re: Status of Phase-Out of Three-Digit Carrier Identification Codes (CICs)

Dear Ms. Matisse:

This letter is in response to Lawrence Strickling's request of August 6, 1998 for information associated with Ameritech's implementation of 7-digit mandatory Carrier Access Code (CAC) dialing. This request sought information on four topics, the last two of which dealt with the effects of a possible work stoppage. Since Ameritech has executed contracts with all its unions, the attached response does not address those last two topics.

If you have any questions, please feel free to contact me directly.

Sincerely,

A handwritten signature in cursive script that reads "Celia Nogales".

Attachments

cc: L. Strickling
K. Monteith

Question 1

Identify the percentage of blocking completed by Ameritech to date and the percentage of blocking expected to be completed by August 15, 1998.

Response

Percentage of blocking completed to date (as of August 12, 1998): 23%

Projected percentage of blocking expected to be completed by August 15, 1998: 30%

Note: Even though some work remains, Ameritech fully intends to complete all necessary steps to implement mandatory 7-digit carrier access code (CAC) dialing by the Commission's September 1, 1998 deadline.

Question 2

Identify any problems areas or barriers that have arisen in the course of Ameritech's work on the blocking of three-digit CICs (e.g., an agreement to a temporary delay in the blocking of three-digit CICs in response to a request from Americatel Corporation).

Response

In response to Americatel's inquiry, Ameritech has worked to address each of their concerns. As a result, Ameritech agreed to make a concerted effort to schedule end office conversions to mandatory 7-digit CAC Dialing in the greater Chicago, Milwaukee, and Gary areas during this latter portion of the conversion period. This agreement will not affect Ameritech's ability to fully implement mandatory 7-digit CAC dialing by September 1, 1998.

1401 H Street, N.W.
Suite 1020
Washington, D.C. 20005
Office 202/326-3810

Celia Nogales
Director - Federal Relations

Ameritech

July 2, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

RECEIVED
JUL - 2 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Statement
CC Docket 92-237

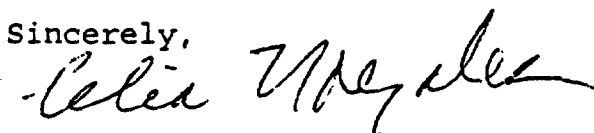
Dear Ms. Salas:

This letter is in response to Common Carrier Bureau staff inquiries regarding Americatel's petition for temporary waiver associated with the Commission's Four-Digit Identification Code (CIC) Implementation proceeding (CC Docket 92-237). The staff's first area of interest was to understand whether Ameritech was engaged in any discussions with Americatel. Please be advised that Ameritech continues to work with Americatel to understand and address its concerns associated with the implementation plan. Specifically, the Commission staff wanted to know if it was feasible for Ameritech to customize the implementation schedule such that areas served by Americatel undergo conversion during the latter portion of the implementation period.

In its Petition, the areas served by Ameritech of particular interest to Americatel include the greater Chicago area and parts of Indiana and Wisconsin. These areas are associated with roughly 25% of the end office switches in the Ameritech region. Therefore, in response to the Commission's inquiry, Ameritech will make a concerted effort to schedule end office conversions to mandatory seven digit carrier access code (CAC) dialing in those areas during the latter portion of the conversion period. No undue hardship on Ameritech is anticipated as a result of this activity.

If you have any questions regarding this matter, I can be reached at (202) 326-3810.

Sincerely,



cc: K. Montieith
L. Strickling

CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of the foregoing Comments of Ameritech Opposing Emergency Petition for Stay has been served on all parties of record, via first class mail, postage prepaid, on this 19th day of August, 1998.

By: Todd H. Bond
Todd H. Bond